

REMARKS

Applicants request reconsideration and withdrawal of the outstanding rejections in view of the foregoing amendments and the following remarks.

Summary

Claims 1, 3-7, 9-17, and 22-24, and 26-30 are pending. Claims 2, 8, 18-21, and 25 have been canceled without prejudice or disclaimer of the subject matter recited therein. Claims 1, 3-7, 9-17, and 22-24, and 26 have been amended. Claims 27- 30 have been added.

Formal Rejection

Claim 26 is rejected under 35 U.S.C. §101. In response, while not conceding the propriety of the rejection, Claim 26 has been amended to change “A computer program stored on an information carrier” to --A computer-readable medium encoded with a computer program--. Therefore, Applicants respectfully request that the rejection be withdrawn.

Substantive Rejections

Claims 1-17 and 22-26 are rejected under 35 U.S.C. §102(e) as being anticipated by Ahne et al. (U.S. Patent No. 7,068,837). Claims 18-21 are rejected under 35 U.S.C. §103(a) as being obvious over Ahne et al. in view of Igarashi et al. (U.S. Patent No. 6,934,048).

In response, while not conceding the propriety of the rejections, independent Claims 1, 12, 24, and 26 have been amended. Applicants submit that as amended, these claims are allowable for the following reasons.

Independent Claim 1 has been amended to relate to a method of managing images on an image management device comprising at least one connector for connection to at least one memory space containing images and selection information identifying images on the memory space in a first category, images on the memory space not in the first category being images in a second category.

Claim 1 has also been amended to recite that the method comprises configuring at least one image management file containing information relating to the management of the images in the first category and to the management of the images in the second category, and saving the image management file in a memory space belonging to the image management device and different from the memory space containing the images and the selection information. Claim 1 has been further amended to recite that then, following connection of the memory space containing images and selection information to the image management device obtaining the selection information for the images from the connected memory space, and managing the images in the first category and the images in the second category according to the information in the at least one configured image management file.

By this arrangement, images can be automatically processed that are previously selected by a camera or other device. Thus, for example, on a camera, images can be selected to identify images in a first category, (images not having been selected forming images in a second category), and when the camera, containing images and the

selection information, is connected to an image management device, the images in the first category and second category can be managed according to the information relating to the processing of the two different categories in the management file in the image management device.

In contrast, the citation to Ahne et al. is not understood to disclose or suggest the steps of 1) configuring at least one image management file containing information relating to the management of images in a first category identified by selection information on a memory space connected to a connector of an image management device and to the management of images in a second category defined as images on the memory space not in the first category, and saving the image management file in a memory space belonging to the image management device and different from the memory space containing the images and the selection information, as recited by amended Claim 1. In addition, this citation, therefore, is not understood to disclose or suggest that following connection of the memory space containing the images and the selection information to the image management device: obtaining the selection information for the images from the connected memory space, and managing the images in the first category and the images in the second category according to the information in the at least one configured image management file, as also recited by amended Claim 1.

Rather, this citation is understood to merely disclose 1) a stand-alone printer that includes software allowing viewing and editing of forms before printing, 2) an internal printer memory for storing documents, 3) a PC attached to the printer for storing documents too large to store in the printer's internal memory, and 4) the storing in the

printer of a file location of a file stored in the PC in the case where the too-large document is stored in an attached PC.

The Office Action cites column 5, lines 33-55 of the patent to Ahne et al. as showing the claimed selection information and management file. But this portion of the Ahne et al. patent is understood to be silent regarding the step of configuring at least one image management file containing information relating to the management of 1) images in a first category identified in selection information as being images on a memory space connected to a connector of an image management device, and 2) images in a second category not in the first category. In addition, this passage of the Ahne et al. patent is also not understood to disclose or suggest the managing of the images in the two categories in accordance with the information in the at least one configured image management file, as also recited by amended Claim 1.

This passage is understood to discuss the user selection of a file for editing (“By selecting a file, the user is given the option of editing the fields of the document selected”). But Applicants submit that this passage is silent as to a) a second category of images not in a first category of images identified by selection information, b) a management file containing information relating to management of such second-category images, or c) the managing of such second-category images, as recited by amended Claim 1.

This passage is also understood to discuss the storage of small documents in the printer and large documents in the PC (“A menu option is added to the currently available interface software to allow the user to select currently saved files in the printer's memory.” “For documents that are too large to be stored on the printer's memory, the user has the option of storing only the document's PC memory location on the printer.”). But the

different documents stored in the printer and in the PC cannot be the claimed first-category and second-category images because Claim 1 recites that these images are contained on “at least one memory space”, while this passage of the Ahne et al. patent indicates that these different documents are stored in different machines (i.e., the printer and the PC). Moreover, there does not appear to be any disclosure in this passage that the documents stored in the printer or the documents stored in the PC comprise a second category of images not in a first category of images identified by selection information. In addition, this passage does not appear to disclose or suggest a management file containing information relating to management of documents comprising such second-category images, or the managing of such second-category images, as recited by amended Claim 1.

As can be seen by reviewing column 5, lines 31-53 which is reproduced below, this passage is not understood to disclose or suggest a management file containing information relating to management of a second category of images not in a first category of images identified by selection information, or the managing of such second-category images, as recited by amended Claim 1:

The LCD provided by the stand-alone printer, for example, gives the user the ability to interact and give commands to the printer. A menu option is added to the currently available interface software to allow the user to select currently saved files in the printer's memory. The files can be accessed using a file management system such as the one used on a Palm Pilot. By selecting a file, the user is given the option of editing the fields of the document selected. Once the user has edited the document, he can either print the edited document or store the document back into memory. The documents mentioned above can be of various types. Some examples are address labels, business cards, income tax forms, or commonly printed images.

For documents that are too large to be stored on the printer's memory, the user has the option of storing only the document's PC memory location on the printer. Thus, when the user chooses to `speed print` a file for which this option has been chosen, the printer `wakes up` the printer's control program on the PC. The control program then finds and prints the correct file based on the memory location that the printer gives it. When this option is chosen, the printer is no longer a `stand-alone` device as defined in the invention background section of this disclosure.

For these reasons, Applicants submit that the Office has not satisfied its burden of proof to establish anticipation of amended Claim 1 by the Ahne et al. patent. And because independent Claims 12, 24, and 26 have been amended in a similar manner, and because new independent Claims 28-30 recite similar features, these claims are allowable for similar reasons. Therefore, Applicants respectfully request the withdrawal of the rejection of independent Claims 1, 12, 24, and 26 and the allowance of these claims and new independent Claims 28-30.

The dependent claims are allowable for the reasons given for the independent claims and because they recite features that are patentable in their own right. Individual consideration of the dependent claims is respectfully solicited.

In view of the above amendments and remarks, the application is now in allowable form. Therefore, early passage to issue is respectfully solicited.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Gary M. Jacobs/

Gary M. Jacobs
Attorney for Applicants
Registration No.: 28,861

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3800
Facsimile: (212) 218-2200

GMJ/trl

FCHS_WS 2167976v1